

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

RIO GRANDE LNG LLC)

DOCKET NO. CP16-454

**MOTION TO INTERVENE OF
CITY OF PORT ISABEL, TEXAS**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Energy Regulatory Commission’s (“Commission”) Rules of Practice and Procedure, 18 CFR §§ 385.212 and 385.214 (2007), the City of Port Isabel, Texas (“City”) hereby moves to intervene in the above-captioned proceeding.

I. Background

On May 5, 2016, Rio Grande LNG, LLC (“Rio Grande LNG”) filed with the commission an Application for Authorization under Section 3(a) of the Natural Gas Act for authority to site, construct, modify, and operate facilities used for the export of natural gas located in Cameron County, Texas (the “project”) in or adjacent to the corporate limits or extra-territorial jurisdiction of the City of Port Isabel, Texas.

II. Motion to Intervene

A. Description of the City

The City, a Texas municipal corporation chartered in 1928, is located in Cameron County, Texas along the shores of the Laguna Madre. In 2014, the American FactFinder recorded the city’s population as 5,022. Principal industries in the city include fishing, tourism and shipping and light industries associated

with the Port Isabel-San Benito Navigation District. As a municipality located adjacent to the proposed project, the city is directly affected.

Visitors to the city will pass by the project before arriving to the city, and elements of the project will be visible from the city. As a community dependent on tourist spending, the aesthetic appeal of the surrounding area is economically-vital. City residents employed in the fishing and tourism industries use waters and other natural environments commercially that may be impacted by the project, while other city residents use potentially impacted waters and environments for recreational purposes. The city, including its schools, housing and health care facilities, are located in close proximity to the project site, and subject to potential adverse health and safety impacts, including emissions, dust, noise and light generated by daily operations, as well as technological hazards associated with potential incidents at the project site. The proximity of the project to the city's transportation infrastructure, including the Brazos Santiago Pass, Gulf Intracoastal Waterway and Port Isabel Ship Channel and Turning Basin, as well as State Highways 100 and 48 expose the city to potential transportation disruption caused by operations or incidents at the project site. Furthermore, the city is highly-dependent on revenues collected from property and sales taxes, and any decline in property values or in tourist visits will result in economic harm to the city.

In addition to impacts related to the project's location in relation to the city, the city also notes potential adverse impacts by the project on cultural and environmental resources located at or adjacent to the project site, including the potential for takings of West Indian Manatees within the Brazos Santiago Pass

and the Brownsville Ship Channel, and impacts upon the Bahia Grande unit of the Laguna Atascosa Wildlife Refuge, which houses endangered species such as the Ocelot, Jagurundi, and numerous bird and plant species; and which has also been the site of discoveries of Karankawa Indian artifacts. The city reasonably believes that the project will impact these precious cultural and environmental resources, which are of significance to Port Isabel residents.

Additionally, the City of Port Isabel reserves the right to add or amend elements related to its standing to intervene in this proceeding.

B. Motion to Intervene

Based on the above, the city has a direct and substantial interest in the above docket, and may be directly impacted by the outcome of t this proceeding. The city cannot be adequately represented by any other party and may be adversely affected or bound without opportunity to present its position unless it is permitted to participate in this matter. Moreover, the city's participation in this proceeding is in the public interest. Accordingly, good cause exists to grant the city's motion to intervene.

III. Communications

All correspondence and communications related to this proceeding should be directed to the following individuals whose names and addresses should be placed on the official service list maintained by the Secretary for this proceeding:

Jared Hockema
City Manager, City of Port Isabel

Gilberto Hinojosa
City Attorney, City of Port Isabel

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IV. Conclusion

Wherefore, for the reasons discussed above, the City of Port Isabel, Texas respectfully requests that the Commission grant the city's motion to intervene as a party in the above-captioned proceeding with all of the rights attendant thereto.

Respectfully submitted,

/s/ Jared Hockema

City Manager, City of Port Isabel, Texas

Dated: June 9, 2016

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the applicant at the address listed in the service list maintained by the Secretary for this proceeding, as required by 18 CFR § 385.2010.

Dated in Port Isabel, Texas, this the 9th day of June, 2016.

/s/ Jared Hockema

City Manager, City of Port Isabel, Texas

305 E Maxan St

Port Isabel TX 78578

Document Content(s)

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